

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,
Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation
Defendant.

| Case No. 3:23-cv-03417-VC

STIPULATION AND [PROPOSED] ORDER REGARDING CASE SCHEDULE

Hon. Vince Chhabria

Pursuant to N.D. Cal. Civil Local Rule 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher Farnsworth (collectively, the “Plaintiffs”); and Defendant Meta Platforms, Inc. (“Meta”) (together, the “Parties”), by and through their respective counsel, stipulate to the following:

1. On November 6, 2025, the Court issued an Order setting a Case Schedule for expert discovery and summary judgment briefing for the remaining claims in this case. Dkt. 641 (the “Scheduling Order”).

2. On November 13, 2025, the Court granted Plaintiffs' Administrative Motion for Leave to Obtain Limited Additional Discovery. Dkt. 647 (the "Additional Discovery Order").

1 3. Pursuant to the Additional Discovery Order and further discovery requests by Plaintiffs and
 2 agreed upon by Meta, Meta expects to produce additional responsive documents over the coming weeks.
 3 Plaintiffs then expect to depose several fact witnesses.

4 4. The Parties agree this additional fact discovery ultimately agreed to and/or ordered may be
 5 relevant to their experts' analysis and reports, which currently are due on December 19, 2025 and January
 6 22, 2026, respectively. The Parties thus respectfully seek to modify the Scheduling Order so the Parties
 7 may complete this discovery, while also affording the Parties' experts time to analyze and incorporate the
 8 results of this Further Discovery into their reports.

9 5. Plaintiffs have also filed a Motion to Amend their Complaint ("Motion to Amend") (ECF
 10 Nos. 658, 659), which Meta opposes. In the event the Motion to Amend is granted over Meta's opposition,
 11 Meta reserves all rights to assert that further extensions of this schedule will be necessary to enable Meta
 12 to take necessary discovery directed to the new claim and plaintiffs and/or address other issues implicated
 13 by the amended complaint. However, the proposed extensions below will also provide sufficient time to
 14 brief and hear this Motion to Amend. Plaintiffs do not agree any additional fact discovery is needed as a
 15 result of their proposed amendments, and even if Meta identifies any non-duplicative discovery the Court
 16 finds is warranted, no further extension of the case schedule would be needed.

17 6. The Parties have also conferred regarding the Court's Order at ECF No. 634, regarding
 18 Plaintiffs' Motion for Relief (ECF No. 630) and requesting the Parties submit a stipulation regarding
 19 adjudication of the Motion for Relief. The Parties agree that further briefing on the Motion for Relief should
 20 be held in abeyance pending an additional update from the Parties.

21 7. In view of the additional time necessary for the Parties' expert analyses, and to allow
 22 sufficient time for any further discovery that is ultimately agreed to by the Parties and/or ordered by the
 23 Court, and to brief and resolve existing and potential disputes concerning the scope of any further discovery,
 24 the Parties jointly propose an extension to the current expert report deadlines, expert deposition and
 25 summary judgment briefing deadlines, as follows:

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| Event | Current Scheduling Order (Dkt. 641) | Proposed Deadline |
|---|--|---------------------------|
| Opening Expert Reports | Friday, December 19, 2025 | Friday, February 27, 2026 |
| Rebuttal Expert Reports | Thursday, January 22, 2026 | Friday, April 3, 2026 |
| Deadline to Complete Expert Depositions | Friday, February 6, 2026 | Thursday, April 23, 2026 |
| Summary Judgment Brief 1 | Thursday, February 12, 2026 | Thursday, April 30, 2026 |
| Summary Judgment Brief 2 | Thursday, March 12, 2026 | Thursday, May 28, 2026 |
| Summary Judgment Brief 3 | Thursday, April 2, 2026 | Thursday, June 18, 2026 |
| Summary Judgment Brief 4 | Thursday, April 16, 2026 | Thursday, July 2, 2026 |
| Summary Judgment Hearing | Thursday, April 30, 2026 | Thursday, July 16, 2026 |

1 Dated: December 12, 2025

2 By: /s/ Phillip E. Morton

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Respectfully submitted,

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ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiffs concurs in the filing of this document.

/s/ Phillip E. Morton
Phillip E. Morton

PROPOSED ORDER

Pursuant to the stipulation of the Parties, the Court grants the Parties' request to amend the Case Schedule.

IT IS SO ORDERED.

DATED: _____

HON. VINCE CHHABRIA
United States District Judge